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WILKINSON) BARKER) KNAUER) LLP

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Federal Communications Commission
Office of Secretary

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com
LEE J. ROSEN
(202) 383-3399
lrosen@wbklaw.com

May 1, 2003

Via Hand Delivery

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Dobson Cellular Systems, Inc. E911 Quarterly Report –
CC Docket No. 94-102*

Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lee J. Rosen

Attachment

cc: David H. Solomon, Chief, Enforcement Bureau
Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau
John Ramsey, Executive Director, APCO
Robert M. Gurss, Counsel, APCO
Terry Peters, Executive Director, NENA
James R. Hobson, Counsel, NENA and NASNA
Evelyn Bailey, NASNA

¹ See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("Order to Stay").

E911 Status – Quarterly Report

CC Docket No. 94-102

May 1, 2003

Summary of Report

Pursuant to the *Order to Stay*,¹ Dobson Cellular Systems, Inc.,² as a Tier II carrier, provides in this Quarterly Report ("Report") information on all pending requests for Phase I and Phase II services received by DCS, including: the entity requesting service; the date the request was received;³ and the status of the request. For Phase I requests that have been pending for over six months or for which the March 1, 2003 Phase II deployment has passed, DCS has also included the projected deployment date (if available), a brief description of the reasons for the delay, and steps it has taken to resolve the issues causing the delay. Detailed information regarding the requests is contained in the attached table.

Phase I Service

DCS has received 70 requests for Phase I services and has activated service in 65 of these jurisdictions. DCS has worked diligently with its third-party location solution vendor, Intrado, as well as the public safety community, in coordinating Phase I deployment. The company remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in these jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

As discussed in its waiver petition, DCS is a mid-sized carrier servicing predominantly rural and suburban markets in 19 states. The company relies primarily upon a TDMA-based network of base stations and switching equipment. As a result of the lack of commercial availability of compliant handset-based Phase II location solutions for TDMA carriers, the company has taken steps to prepare to deploy a network-based solution.

DCS's network consists of approximately 15 Mobile Switching Centers, a majority of which utilize equipment manufactured by Nortel Networks ("Nortel"), the rest utilizing some Lucent Technologies ("Lucent") TDMA network equipment. DCS has worked with these equipment vendors to prepare for Phase II deployment, as all switch upgrades necessary to supply Phase II services were completed by Lucent by August, 2002 and by Nortel by June, 2002.

In addition, DCS has executed an exclusive contract with Grayson Wireless to provide the PDE equipment necessary to deploy its Phase II network-based location solution. The vendor has contracted to provide compliant Phase II services in Erie County, PA; Genesee County, NY; Cattaraugus County, NY; Chautauqua County, NY; and Austin County, TX as discussed below. In fact, DCS hopes to deploy Phase II services to 100% of the area in Erie

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("*Order to Stay*").

² The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively "DCS").

³ As indicated in the table, the provided "request date" indicates the date the PSAP/requesting entity sent its request to DCS. This date may not correspond with the date the PSAP's/requesting entity's request was "valid" per Section 20.18(j) of the rules.

County, PA; Genesee County, NY; and Cattaraugus County, NY. DCS is currently deploying Phase II services to these jurisdictions in accordance with mutually agreed to timetables which have been negotiated or are currently under discussion with PSAPs.

B. Phase II Requests

DCS has received requests for Phase II service from the following five jurisdictions: Erie County, PA; Genesee County, NY; Cattaraugus County, NY; Chautauqua County, NY; and Austin County, TX. On October 3, 2002, the company sent correspondence to the contacts for Erie, Genesee and Cattaraugus Counties, stating that it is tentatively considering each request "valid" solely for purposes of good faith and intends to provide Phase II services. The status of these requests is detailed in the attachment. For each active request, DCS is proceeding with deployment, and proceeding in good faith even for PSAPs who have not yet provided *Richardson* documentation.

To ensure that it may properly prioritize its E911-designated resources, DCS has requested each of these PSAPs to provide documentation pursuant to the *Richardson* criteria.⁴ DCS has received a response to its request from these PSAPs and is proceeding in good faith and has signed a contract with Grayson to provide Phase II capabilities in Erie, Cattaraugus, Genesee and Austin Counties. Furthermore, in Chautauqua County, DCS has also requested that the PSAP provide documentation pursuant to the *Richardson* criteria⁵, and was notified by the LEC that the county is not ready to accept Phase II at this time. Finally, on February 11, 2003 DCS sent correspondence to Austin County requesting documentation pursuant to the *Richardson* criteria. DCS has received a reply from the county and considers Austin County's request valid.

C. Deployment Issues

In discussions with Grayson Wireless, however, DCS has learned that leasing and zoning issues may affect DCS' ability to meet the March 1, 2003 deployment deadline in some markets. Specifically, in order to meet the Commission's network-based accuracy requirements, Grayson Wireless has informed the company that it will need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

DCS brought similar matters to the Commission's attention in its original waiver request.⁶ Accordingly, if necessary, DCS may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁷

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

⁴ *Id.*

⁵ *Id.*

⁶ See Dobson Cellular Systems, Inc. Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

⁷ See *Order to Stay* at ¶ 41.

**Dobson Cellular Systems, Inc.
Wireless E9-1-1 Phase I & II
Service & "Request" Summary**

STATUS OF PHASE I DEPLOYMENT --

State	County	Requesting Entity Name	Request Date	Status	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
MI	Kalkaska	Michigan Communications Director Association	04/30/01	Service activated on 4/08/02. State administrative issues.		
MI	Mason	Michigan Communications Director Association	09/01/00	Service activated on 8/19/02. PSAP was not Phase I capable at time of request.		
MI	Manistee	Michigan Communications Director Association	09/01/00	Service activated on 3/19/02. State administrative issues.		
MI	Missaukee	Michigan Communications Director Association	09/01/00	Service activated on 3/19/02. State administrative issues.		
MI	Osceola	Michigan Communications Director Association	09/01/00	Service activated on 4/25/02. State administrative issues.		
MI	Lake	Michigan Communications Director Association	09/01/00	Service activated on 4/09/02. State administrative issues.		
MI	Antrim	Antrim County Sheriff	11/11/01	DCS/INTRADO:	DCS is ready to	05/25/03

¹ Indicates date PSAP sent letter to DCS requesting service; does not correspond with date PSAP's request was "valid" per Section 20.18(j) of the rules.

		Office		Awaiting signaling sequences from third party provider. PSAP was not Phase I capable at time of request. Trunking issues from LEC.	deploy. Spoke with PSAP director to discuss date.	
MI	Charlevoix	Michigan Communications Director Association	09/01/00	Service activated on 4/08/02. State administrative issues.		
MI	Leelanau	Michigan Communications Director Association	09/01/00	Service activated on 3/18/02. State administrative issues.		
MI	Wexford	Michigan Communications Director Association	09/01/00	Service activated on 3/19/02. State administrative issues.		
MI	Emmet	Michigan Communications Director Association	09/01/00	Service activated on 4/09/02. State administrative issues.		
MI	Benzie	Michigan Communications Director Association	09/01/00	Service activated on 4/09/02. State administrative issues.		
MI	Grand Traverse	Michigan Communications Director Association	09/01/00	Service activated on 3/18/02. State administrative issues.		
MI	Huron	Michigan Communications Director Association	09/01/00	Service activated on 2/15/02. State administrative issues.		
MI	Sanilac	Michigan Communications Director Association	09/01/00	Service activated on 2/22/02. State administrative issues.		
MI	Tuscola	Michigan Communications	09/01/00	Service activated on 2/13/02. State		

TX	Bastrop	Director Association CSEC	10/12/99	administrative issues. Service activated on 03/18/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Caldwell	CSEC	10/12/99	Service activated on 03/18/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Fayette	CSEC	10/12/99	Service activated on 03/18/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Lee	CSEC	10/12/99	Service activated on 03/18/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Gonzales	CSEC	10/12/99	Service activated on 01/15/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Jackson	CSEC	10/12/99	Service activated on 01/15/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Lavaca	CSEC	10/12/99	Service activated on 01/15/01. PSAP		

TX	Milam	CSEC	10/12/99	Service activated on 02/13/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Hamilton	CSEC	10/12/99	Service activated on 02/13/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Falls	CSEC	10/12/99	Service activated on 02/28/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Freestone	CSEC	10/12/99	Service activated on 02/28/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Limestone	CSEC	10/12/99	Service activated on 02/28/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Bosque	CSEC	10/12/99	Service activated on 02/28/01. PSAP readiness and Council of Governments' administrative issues.		

TX	Hill	CSEC	10/12/99	Service activate on 02/28/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Colorado	CSEC	10/12/99	Service activated on 02/21/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Fort Bend	CSEC	10/12/99	Service activated on 02/21/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Matagorda	CSEC	10/12/99	Service activated on 02/21/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Wharton	CSEC	10/12/99	Service activated on 02/21/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Navarro	CSEC	10/12/99	Service activated on 04/15/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Erath	CSEC	10/12/99	Service activated on 04/15/01. PSAP readiness and Council		

				of Governments' administrative issues.		
TX	Armstrong	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Carson	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Collingsworth	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Donely	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Gray	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Hansford	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Hemphill	CSEC	10/12/99	Service activated on		

				02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Hutchinson	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Lipscomb	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Ochiltree	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Roberts	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Wheeler	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Robertson	CSEC	10/12/99	Service activated on 04/15/01. PSAP readiness and Council of Governments'		

TX	Burleson	CSEC	10/12/99	administrative issues. Service activated on 04/15/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Leon	CSEC	10/12/99	Service activated on 04/15/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Washington	CSEC	10/12/99	Service activated on 04/15/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Anderson	CSEC	10/12/99	- At time of request, PSAP was not connected to S/R. Athens S/R connection and turn up was completed in September 2002. - Translation problems at the switch resulted in interim delay. - Service since activated on 1/10/03.		
TX	Van Zandt	CSEC	10/12/99	- At time of request, PSAP was not connected to S/R. Athens S/R connection		

				<p>and turn up was completed in September, 2002.</p> <ul style="list-style-type: none"> - Translation problems at the switch resulted in interim delay. - Service since activated on 1/10/03 		
TX	Coleman	CSEC	10/12/99	Service activated on 03/08/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Brownwood	CSEC	10/12/99	Service activated on 03/08/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Comanche	CSEC	10/12/99	Service activated on 03/08/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Runnels	CSEC	10/12/99	Service activated on 03/08/01. PSAP readiness and Council of Governments' administrative issues.		
TX	Eastland	CSEC	10/12/99	Service activated on 02/21/01. PSAP readiness and Council of Governments'		

				administrative issues.		
TX	Austin	Austin County Emergency Communications District	1/14/02	Delays in completion of trunking upgrades by LEC. Trunks are now installed and testing began in February 2003. Service activated on 3/13/03.		02/15/03
OK	Cherokee	Cherokee County	3/14/02	Administrative delays relating to pANI issues. DCS sent letter (dated 12/23/02) to county stating that DCS will deploy 120 days after PSAP provides documentation that cost recovery issues with LEC have been resolved.	DCS is willing to supply pANI to PSAP.	TBD – awaiting PSAP reply
MD	Talbot	Talbot County	8/07/02	LEC: Trunks were due 11/20/02 from LEC. Trunks are now in and testing initiated February 2003. Testing in February unsuccessful. Testing initiated on April 23,2003 and was unsuccessful.	Additional testing planned.	TBD

PA	Erie	Erie County Emergency Management Agency	04/12/01	Service activated on 2/06/02.		
PA	Crawford	Crawford County	3/26/02	Call testing to begin first week November, 2002. Delay in receiving trunks from LEC; trunks are installed and testing began in February 2003. Service activated on 2/19/03.	DCS is ready to deploy. Third party provider loading pANI in database.	
NY	Allegany	Allegany County	7/18/02	Delay in receiving trunks from LEC. Trunks are now installed and testing began in February 2003. Service activated on 3/26/03.	N/A	
NY	Cattaraugus	Cattaraugus County Sheriff Office	05/22/01	PSAP cost recovery issues; LEC delay in issuing trunks. Service activated on 8/06/02.		
NY	Chautauqua	Office of the Sheriff	06/01/01	Service activated on 5/17/02. PSAP cost recovery issue.		
NY	Genesee	Office of the Sheriff	04/10/01	Working on test call issues. LEC delays in issuing trunks.		

				Service activated on 11/21/02		
TX	Henderson	Henderson County Communications District	01/09/03	Awaiting network recommendation from third party provider. Received Network Recommendations. Trunks are ordered.	N/A	07/09/03
NY	Kent	Kent County Emergency Management Agency	04/23/03	N/A	N/A	10/23/03

STATUS OF RESPONSE TO PHASE II INQUIRIES/REQUEST--

State	County	Requesting Entity Name	Request Date	Status	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
PA	Erie	Erie County Emergency Response Management Agency – Erie County E911 Center	4/12/2001*	<ul style="list-style-type: none"> - Dobson responded by letter (4/23/2001), requesting verification of capabilities and cost recovery mechanism. - Erie County did not respond. - Dobson sent letter 10/3/02 notifying County that it is tentatively considering request to be “valid” and plans to 	DCS is involved in ongoing discussions with PSAP to determine alternative date. Equipment from PDE provider has been ordered and is to be shipped in April 2003. Nortel and Grayson in	TBD. DCS intends to deploy Phase II in good faith notwithstanding lack of PSAP readiness documentation.

				<p>deliver Phase II services by 3/1/03, but also requested documentation pursuant to <i>Richardson</i>.</p> <ul style="list-style-type: none"> - DCS has not received a response from county but intends to tentatively treat request as "valid" pending PSAP's provision of <i>Richardson</i> documentation. - Dobson has signed contract with Grayson on 12/13/02. 	discussions concerning the AMU (Abis Monitoring Unit) for GSM.	
NY	Genesee	Office of Sheriff, Genesee County, New York	(4/10/2001)* 9/5/2002 (received 9/9/02)	<ul style="list-style-type: none"> - Dobson responded by letter, (dated 4/17/2001), requesting verification of capabilities and cost recovery mechanism. - Genesee County replied by letter, (dated 7/27/2001), stating that PSAP has been upgraded to receive Phase I (via CAS); no statement as to Phase II readiness. - County sent "official" Phase II request 9/5/02 (received 9/9/02), indicating Phase I compliant utilizing NCAS solution. - Dobson sent letter 10/3/02 notifying County that it is tentatively considering request to be "valid" and plans to deliver Phase II services by 3/9/03, but also requested 	DCS is involved in ongoing discussions with PSAP to determine alternate date. Equipment from PDE provider has been ordered and is to be shipped in April 2003. Nortel and Grayson in discussions concerning the AMU (Abis Monitoring Unit) for GSM	TBD. DCS intends to deploy Phase II in good faith notwithstanding lack of PSAP readiness documentation.

				<p>documentation pursuant to <i>Richardson</i>.</p> <ul style="list-style-type: none"> - DCS has not received a response from the county but intends to tentatively treat request as "valid" pending PSAP's provision of <i>Richardson</i> documentation. - Dobson has signed contract with Grayson on 12/13/012. 		
NY	Cattaraugus	Cattaraugus County Sheriff Office	6/05/02*	<ul style="list-style-type: none"> - Dobson responded by letter, (dated 8/31/02) requesting verification of capabilities and cost recovery mechanism. - Cattaraugus County replied by email that they are capable of receiving Phase II calls. - Dobson sent letter 10/3/02 notifying County that it is tentatively considering request to be "valid" and plans to deliver Phase II services by 3/1/03, but also requested documentation pursuant to <i>Richardson</i>. - Dobson has not received a response from the County but intends to tentatively treat request as "valid" pending PSAP's provision of <i>Richardson</i> documentation. 	DCS is involved in ongoing discussions with PSAP to determine alternative date. Equipment from PDE provider has been ordered and is to be shipped in April, 2003. Nortel and Grayson in discussions concerning the AMU (abis Monitoring Unit) for GSM.	TBD. DCS intends to deploy Phase II in good faith notwithstanding lack of PSAP readiness documentation.
NY	Chautauqua	Office of the Sheriff	12/13/02	Dobson responded by letter (dated 1/9/03) requesting	N/A	6/13/03 or within 6 months

				verification of capabilities and cost recovery mechanism pursuant to <i>Richardson</i> . - Dobson has not received a response from the County. Dobson had a conversation with the LEC and was notified that county is not ready to accept Phase II calls.		of <i>Richardson</i> documentation.
TX	Austin	Austin County Emergency Communications	01/28/03	Dobson sent letter to County requesting documentation pursuant to <i>Richardson</i> dated 2/11/03. PSAP responded that there is a cost recovery mechanism in place and the PSAP is capable of receiving Phase II 911 calls.	N/A	07/28/03

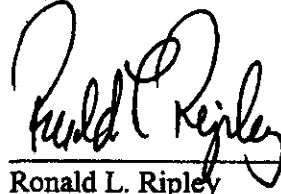
* Contact indicated entity was "requesting" deployment both Phase I and Phase II services.

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of Dobson Cellular Systems, Inc. ("DCS").

I have reviewed the DCS E911 Phase II Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read "Ronald L. Ripley", written over a horizontal line.

Ronald L. Ripley
Vice President &
Senior Corporate Counsel

Executed on: April 30, 2003

CERTIFICATE OF SERVICE

I, LaTashia T. Williams, hereby certify that on the 1st day of May 2003, copies of the foregoing "Quarterly Report" were sent by first class mail, postage pre-paid, or by hand delivery (*) to the following:

David H. Solomon*
Chief
Enforcement Bureau
Federal Communications Bureau
445 12th St., SW, Room 7C-485
Washington, D.C. 20554

John Muleta*
Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th St., SW, Room 3C-252
Washington, D.C. 20554

John Ramsey
Executive Director, APCO
APCO International, Inc.
World Headquarters
351 N. Williamson Blvd.
Daytona Beach, FL 32114

Robert M. Gurss
Counsel, APCO
Shook, Hardy and Bosto
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005

Terry Peters
Executive Director, NENA
422 Beecher Road
Columbus, OH 43230

James R. Hobson
Counsel, NENA and NASNA
Miller & VanEaton
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036

Evelyn Bailey
President, NASNA
94 State Street
Drawer 20
Montpelier, VT 05620

Qualex International*
Federal Communications Commission
445 12th St., SW, Room CY-B402
Washington, D.C. 20554


LaTashia T. Williams